

# ***EXHIBIT 11***

Nancy Crowther

June 17, 2022

1 UNITED STATES DISTRICT COURT  
2 for the  
3 WESTERN DISTRICT of TEXAS

4 LA UNION DEL PUEBLO  
5 ENTERO, et. Al.

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6 Plaintiff,

7 v.

Civil Action No.  
5:21-cv-00844-XR

8 GREGORY W. ABBOTT, et al.

9 Defendant.

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11 ORAL AND VIDEOTAPED DEPOSITION OF  
12 NANCY CROWTHER

13 June 17, 2022

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15 ORAL and VIDEOTAPED DEPOSITION OF NANCY CROWTHER,  
16 produced as a witness at the instance of the Plaintiff,  
17 and duly sworn, was taken in the above-styled and  
18 -numbered cause on the 17th day of June, 2022, from  
19 10:08 a.m. to 3:14 p.m., before Karen A. Gonzalez,  
20 Commissioned Notary, in and for the State of Texas,  
21 reported by machine shorthand, remotely from Dallas  
22 County, Texas, pursuant to the Texas Rules of Civil  
23 Procedure, the Texas Supreme Court Emergency Order  
24 Regarding the Covid-19 State of Disaster and the  
25 provisions stated on the record or attached hereto.

1 the sort of help that you will need in the future -- not  
2 that you need right now, but that you will need in the  
3 future. Is that your concern?

4 MS. SIFUENTES-DAVIS: Objection, form.

5 A. That's part of the concern.

6 Q. (BY MR. HERBERT) Okay. What's the rest of the  
7 concern?

8 A. That something as meaningful as voting is to me,  
9 that I need assistance with now, much less more in the  
10 future, has now a bump, or speed bump, in the process,  
11 to where now it's become more threatening to bring an  
12 attendant in because they have to sign something that  
13 says, Legally, if you do X, Y, and Z, you are in  
14 violation of this law.

15 And it's like, why would I want to bring a  
16 person, much less my attendant, into that role and have  
17 them get all freaked out about, You mean to tell me if I  
18 help you do something that is not on this form or I do  
19 something that is on this form, I could get in trouble?

20 And it's just not worth it when your life is  
21 dependant on your attendant or your caregiver or your  
22 spouse or anything. It's just not worth it.

23 Q. Okay. So let me -- let me try and -- correct me  
24 if I'm wrong, but let me try and categorize the concerns  
25 that you have with the oath, and then we can talk about

1 really quick questions.

2 CROSS-EXAMINATION

3 BY MS. SIFUENTES-DAVIS:

4 Q. You testified that your attendant had not been  
5 required to take the new assisters' oath thus far.

6 Do you know if that will continue to be the case  
7 in the future?

8 MR. HERBERT: Objection, form.

9 A. That just depends if they enforce it.

10 Q. (BY MS. SIFUENTES-DAVIS) And are you concerned  
11 that your attendant may be required to take this new  
12 oath in the future?

13 MR. HERBERT: Objection, form.

14 A. Yes.

15 Q. (BY MS. SIFUENTES-DAVIS) I don't have any other  
16 questions.

17 Would you like to read and sign?

18 A. Yes.

19 MS. SIFUENTES-DAVIS: Off the record.

20 THE VIDEOGRAPHER: Off the record at  
21 3:14 p.m.

22 (Conclusion of deposition at 3:14 p.m.)  
23  
24  
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